

1 MELINDA HAAG (CSBN 132612)
United States Attorney
2 JOANN M. SWANSON (CSBN 88143)
Chief, Civil Division
3 MICHAEL T. PYLE (CSBN 172954)
JAMES A. SCHARF (CSBN 152171)
4 Assistant United States Attorneys

5 U.S. Attorney's Office/Civil Division/San Jose Branch
150 Almaden Blvd., Suite 900
6 San Jose, California 95113
Telephone: (408) 535-5044
7 Facsimile: (408) 535-5081
E-mail: james.scharf@usdoj.gov

8 Attorneys for Defendant United States of America

9 ALI R. MOGHADDAMI (CSBN 174548)
10 Moghaddami & Sadigh
11 333 East Glenoaks Boulevard, Suite 202
Glendale, CA 91207-2099
TEL: (818) 500-4111
12 FAX: (818) 500-4144
E-mail: amoghi@aol.com

13 MICHAEL L. ORAN (CSBN 110970)
14 Law Office of Michael L. Oran
800 Wilshire Boulevard
15 Suite 500
Los Angeles, CA 90017
16 Telephone: (213) 624-1177
Facsimile: (213) 624-1161
17 E-mail: miloran@mloesq.com

18 Attorneys for Plaintiff

19
20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 BENHAM HALALI,) No. 09-4900 RS
24 Plaintiff,)
25 v.) STIPULATION AND ~~PROPOSED~~
26 UNITED STATES OF AMERICA ET AL.,) ORDER RE EXPERT DEPOSITION
27 Defendants.) DISCOVERY AND FURTHER CMC
28

1 Whereas, the parties have completed all non-expert discovery, in compliance with the Court's
2 April 21, 2011, Case Management Scheduling Order, Document 41, ("CMSO").

3 Whereas, plaintiff served his expert disclosures on September 16, 2011, in compliance with
4 the CMSO.

5 Whereas, defendant will serve its expert disclosures on November 4, 2011, in compliance
6 with the CMSO.

7 Whereas, the CMSO provides that expert deposition discovery must be completed by
8 November 18, 2011.

9 Whereas, a Further Case Management conference is set for November 17, 2011, at 10:00 a.m.

10 Whereas, the parties have scheduled a full-day, private mediation with Charlie Hawkins on
11 November 22, 2011.

12 Whereas, in order to conserve resources, the parties desire to briefly postpone expert
13 deposition discovery and the Further Case Management Conference until after the mediation.

14 Whereas, the requested postponement will not affect any of the other dates imposed by the
15 CMSO, including the February 2, 2012, Pretrial Conference and the February 13, 2012, Trial.

16 Therefore, the parties jointly request the Court to extend expert deposition discovery to
17 December 23, 2011. The parties further request that the Further Case Management Conference
18 be continued to December 1, 2011, at 10:00 a.m., or to any date thereafter that may be more
19 convenient to the Court.

20

21 Dated: September 23, 2011

22

23

Respectfully submitted,

24

MELINDA HAAG
United States Attorney

25

26

By: /S/
JAMES A. SCHARF
Assistant United States Attorney
Attorney for Defendant

27

28

1 || LAW OFFICE OF MICHAEL L. ORAN

2 By: /S/
3 MICHAEL L. ORAN
Attorney for Plaintiff

Pursuant to the parties' stipulation, and good cause appearing, it is hereby ordered:
5
Expert deposition discovery is extended to December 23, 2011. The Further Case Management
6
Conference is continued to December 1, 2011, at 10:00 a.m. [or] [redacted].

8 Dated: September 27, 2011


Hon. Richard Seeborg
United States District Court Judge

STIPULATION AND [PROPOSED] ORDER RE EXPERT DEPOSITION DISCOVERY AND FURTHER CMC